

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES OF)	
CLIFF MANOR, INC., INTEGRATED)	
HEALTH SERVICES AT RIVERBEND,)	Civil Action No. 04-910
INTEGRATED HEALTH SERVICES AT)	
SOMERSET VALLEY, INC., ALPINE)	
MANOR, INC., BRIARCLIFF NURSING)	
HOME, INC., SPRING CREEK OF IHS, INC.,)	
FIRELANDS OF IHS, INC., ELM CREEK OF)	
IHS, INC., and IHS LONG TERM CARE)	
SERVICES, INC.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
THCI COMPANY LLC,)	
)	
Defendant,)	
)	
v.)	
)	
ABE BRIARWOOD CORPORATION and)	
JOHN DOES 1-10,)	
)	
Additional Counterclaim)	
Defendants,)	
)	

PLAINTIFFS' MOTION TO REMAND

Plaintiffs IHS Long Term Care Services, Inc. and the other plaintiffs, as well as additional counterclaim defendant Abe Briarwood Corporation (collectively, the "Movants"), hereby move this Court, pursuant to 28 U.S.C. §§ 1452(b), 1447(c) and 1367(c)(3), for an order remanding this case to the Circuit Court of the County of Platte, State of Missouri. In support of

this Motion, the Movants submit and rely on Plaintiffs' Memorandum of Law in Support of Motion to Remand and the Declaration of Richard W. Riley in Support of Motion to Remand, which have been filed contemporaneously with this Motion.

DATED: March 30, 2006

DUANE MORRIS LLP



Michael R. Lastowski (DE I.D. 3892)
Richard W. Riley (DE I.D. 4052)
1100 North Market Street, Suite 1200
Wilmington, DE 19801-1246
Telephone: (302) 657-4900
Facsimile: (302) 657-4901
E-mail: mlastowski@duanemorris.com
cmwinter@duanemorris.com

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TROUTMAN SANDERS LLP
Amos Alter, Esquire
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
Telephone: (212) 704-6000
Facsimile: (212) 704-6288
E-mail: Amos.Alter@troutmansanders.com

*Attorneys for Plaintiff Integrated Health
Services of Cliff Manor, Inc. et al. and
Counterclaim Defendant Abe Briarwood Corp.*